

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF SCOTT BINNINGS
IN SUPPORT OF DEFENDANTS' JUNE 2,
2025 PRIVILEGE DISPUTE BRIEF
PURSUANT TO SPECIAL MASTER
ORDER NO. 4, § III, ¶ 4**

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 10 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my

1 current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal
2 advice to Uber's leadership and employees related to safety issues, procedures, and policy, among
3 other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants
4 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's June 2, 2025 Brief Pursuant to Special
5 Master Order No. 4 § III, ¶ 4 (ECF 2933). The facts set forth herein are true and correct and are based
6 on my own personal knowledge, and I could and would competently testify thereto if called.
7

8 2. I have reviewed the document identified in the privilege log as
9 JCCP_MDL_PRIVLOG095858. This document relates to a program intended to reduce the risk of
10 sexual assault and misconduct. I provide the company legal advice concerning safety issues, including
11 Uber's app safety features and assessing the impact of those features.
12

13 3. Uber in-house counsel, including on the Safety Legal team and others, work very
14 closely with Uber's product team, engineers, and data scientists during the development of potential
15 new safety features because of their relevance in ongoing litigation and forward-looking legal risks
16 associated with the development and launch of these features. The program discussed in
17 JCCP_MDL_PRIVLOG095858 was viewed as a particularly complex feature from a legal
18 perspective, as it raised an array of legal considerations spanning federal, state, and local legal issues.
19

20 4. For example, certain new features cannot be tested in many states and cities due to state
21 statutes and local regulations, without assuming heightened legal risk. Therefore, I and other in-house
22 counsel, with support from outside counsel, advise development teams on where tests can be
23 conducted and the experimental parameters that may be evaluated.


24 5. I am familiar with the document identified in the privilege log as
25 JCCP_MDL_PRIVLOG095858. This document provides an update on the development of the
26 program intended to reduce the risk of sexual assault and misconduct also discussed in
27

JCCP_MDL_PRIVLOG095858. It is marked “Attorney-Client Privileged” at the top of each page of the document and I am one of the Google collaborators identified for this document. These types of updates were directed to me as then-Legal Director, Global Safety so I could evaluate the status of the launch of this feature and advise the development team on legal risks associated with the plans for moving the feature forward. In my role as in-house counsel on safety issues, I would evaluate experimental data, such as the Model Performance Data and other data in this document, and advise the development team on legal risks associated with the plans for moving the feature forward. Indeed, this document (-95858) is an example of the data and feedback that I reviewed to fulfill my role. I specifically reviewed this document and other related documents throughout the course of the feature’s development, and attended many meetings and other forums to provide legal advice referencing these documents.

6. I am familiar with the document identified in the privilege log as JCCP_MDL_PRIVLOG094281. It is an email that was sent to me and Akankshu Dhawan, then-Product Manager, Safety. The email summarizes for the Safety Team the status and proposed launch of a feature intended to reduce incidents of interpersonal conflict on the Uber platform outside of the United States, which I advised on to comply with legal and regulatory requirements. Accordingly, the email reflects my legal advice and work performed under my direction as the in-house counsel working on this release. I, along with other attorneys on the Safety Legal Team, have been deeply involved in, and provided legal advice and counsel for, the creation, testing and launch of this feature. The involvement of legal counsel in this feature is further illustrated by the request at the end of the communication to include me on any questions relating to the rollout of the feature, allowing for the input of my legal advice. This email facilitated my provision of legal advice concerning this model and ensured that I concurred with the summary of the launch plan’s legal and regulatory compliance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 30, 2025.

By: /s/ 
Scott Binnings